



SEALED

**Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard South,
Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336**

FILED.

DATED: 8:31 am, August 12, 2020

U.S. MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KELTON KAREEM SIMON,

Defendant.

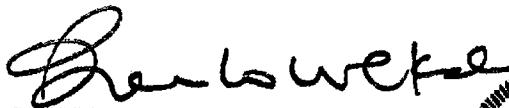
Case No. 2:20-mj-704-BNW

SEALING ORDER

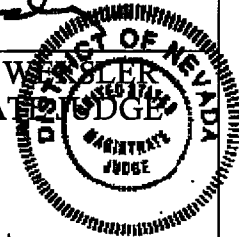
(under seal)

Based on the pending Application of the Government, and good cause appearing therefor, **IT IS HEREBY ORDERED** that the Complaint and Arrest Warrant, in the above-captioned matter shall be sealed until further Order of the Court.

DATED this 12th day of August 2020.



THE HONORABLE BRENDA WEBSTER
UNITED STATES MAGISTRATE JUDGE



FILED.

DATED: 8:31 am, August 12, 2020

U.S. MAGISTRATE JUDGE

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2 District of Nevada
Nevada Bar No. 13644
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6

7 *Representing the United States of America*

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,
11 Plaintiff,

12 v.

13 KELTON KAREEM SIMON,
14 Defendant.

Case No. 2:20-mj-704-BNW

APPLICATION TO SEAL

(under seal)

16 COMES NOW the United States of America, by and through Nicholas A. Trutanich,
17 United States Attorney, and Kimberly Sokolich, Assistant United States Attorney, and
18 respectfully moves this Honorable Court for an Order sealing the Complaint, together with
19 the Court's Arrest Warrant, in the above-captioned matter until such time as this Honorable
20 Court, or another Court of competent jurisdiction, shall order otherwise.

21 According to Title 18, United States Code, Section 3103a(b)(1) the court may delay
22 any notice required, or that may be required, if there is reasonable cause to believe that
23 providing immediate notification of the execution of the arrest warrant may have an adverse
24

1 result. In this case, such an order would be appropriate because the Complaint relates to an
2 ongoing criminal investigation into violations of Title 18 U.S.C. §1361 – Depredation Against
3 Federal Property of the United States; that is neither public nor known to all of the targets of
4 the investigation, of which all of the participants are not yet known. Specifically, as noted in
5 the Complaint, multiple individuals participated in the damage at the Foley Federal Building.
6 The FBI is still working to identify other individuals who aided and abetted the defendant in
7 the destruction of government property. Some of these individuals are seen in in Images 1
8 and 2 of the complaint. Disclosure of the information will jeopardize the investigation,
9 including by alerting the targets to the ongoing investigation and giving the targets an
10 opportunity to flee or continue flight from prosecution, destroy or tamper with evidence,
11 change patterns of behavior, or notify confederates.

12 For the reasons stated above and to protect the integrity of an ongoing investigation,
13 it is requested that the Complaint and Arrest Warrant documents are sealed.

14 DATED this 12th day of August, 2020.

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16 Respectfully submitted,

17 NICHOLAS A. TRUTANICH
18 United States Attorney

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20 KIMBERLY SOKOLICH
21 Assistant United States Attorney
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